

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JOEL RICH and MARY RICH,	:	
	:	Civil Action No. 1:18-cv-02223
Plaintiffs,	:	(GBD)(SN)
	:	
v.	:	
	:	
FOX NEWS NETWORK, LLC, MALIA	:	
ZIMMERMAN in her individual and professional	:	
capacities, and ED BUTOWSKY, in his individual	:	
and professional capacities,	:	
	:	
Defendants.	:	
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**PLAINTIFFS' MOTION TO FILE UNDER SEAL PORTIONS OF PLAINTIFFS'
OPPOSITION TO FOX NEWS NETWORK, LLC'S AND MALIA ZIMMERMAN'S
SECOND MOTION TO DISMISS AND CERTAIN EXHIBITS IN SUPPORT THEREOF
UNDER SEAL**

Plaintiffs Mary and Joel Rich respectfully request that the Court authorize the sealed filing of a portion of their Opposition to Fox News Network, LLC's and Malia Zimmerman's Second Motion To Dismiss (the "Opposition"), as well as Exhibits 2, 3, and 4 (collectively, the "Confidential Exhibits") attached to the Declaration of Eli J. Kay-Oliphant, filed therewith.

Plaintiffs respectfully request leave to file partially under seal because the Confidential Exhibits 3 and 4 were designated "Confidential" by a producing party pursuant to Stipulated Confidentiality Agreement and Protective Order (the "Protective Order"), entered by this Court on February 6, 2020. (Dkt. No. 107), and Confidential Exhibit 2 was designated confidential pursuant to a similar protective order in another proceeding. As such, Plaintiffs agreed to give the Confidential Exhibits (and any portion of the Opposition that discusses their content) confidential treatment pursuant to ¶ 16 of the Protective Order.

Plaintiffs will today submit unredacted copies of the Confidential Exhibits and the Opposition to this Court via mail or hand delivery, as well as courtesy copies of the Confidential Court Submission to opposing counsel, pursuant to ¶ 11 of the Protective Order.

Dated: February 28, 2020

Respectfully submitted,

By: /s/ Eli J. Kay-Oliphant

MASSEY & GAIL L.L.P.
Leonard A. Gail (*pro hac vice*)
Eli J. Kay-Oliphant (EK8030)
Suyash Agrawal (SA2189)
50 East Washington Street, Suite 400
Chicago, IL 60602
Telephone: (312) 283-1590
lgail@masseygail.com
ekay-oliphant@masseygail.com
sagrawal@masseygail.com

SUSMAN GODFREY LLP
Arun Subramanian (AS2096)
Elisha Barron (EB6850)
Beatrice Franklin (BF1066)
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330
asubramanian@susmangodfrey.com
ebarron@susmangodfrey.com
bfranklin@susmangodfrey.com

Attorneys for Plaintiffs Joel and Mary Rich

CERTIFICATE OF SERVICE

I hereby certify this 28th day of February, 2020, that I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification to the attorneys of record.

/s/ Eli J. Kay-Oliphant

Eli J. Kay-Oliphant